

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

1. CHRISTOPHER PETERSON	)	
	)	
Plaintiff,	)	19-cv-376-RAW
	)	
v.	)	
	)	JURY TRIAL DEMANDED
1. BOARD OF COUNTY COMMISSIONERS	)	
OF LEFLORE COUNTY, OKLAHOMA,	)	
2. KENDALL MORGAN,	)	
3. JASON TIMMS,	)	
4. TYLER RAGAN,	)	
5. LEFLORE COUNTY SHERIFF, In His	)	
Official Capacity,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

**DEFENDANTS' BOARD OF COUNTY COMMISSIONERS  
OF LEFLORE COUNTY AND THE SHERIFF OF LEFLORE COUNTY,  
in his official capacity, WITNESS LIST**

COMES NOW, Defendants Board of County Commissioners of LeFlore County and the Sheriff of LeFlore County, in his official capacity, pursuant to this Court's Amended Scheduling Order dated September 4, 2020 (Doc. 52), and submits the following Witness List in this matter:

No.	Name	Expected Testimony
1.	Kendall Morgan c/o Jim Gibbs Goolsby, Proctor, Heefner & Gibbs, P.C. 701 N. Broadway Avenue, Suite 400 Oklahoma City, OK 73102-6006	Is the former Undersheriff; will testify regarding his knowledge of the incident at issue in this case; will testify regarding his training and experience in law enforcement and in re the LCSO's policies and procedures; will testify regarding his knowledge of and interactions with the Plaintiff.
2.	Tyler Ragan c/o Jim Gibbs	Is a former Deputy Sheriff; will testify regarding his knowledge of the incident at issue in this case; will testify

	Goolsby, Proctor, Heefner & Gibbs, P.C. 701 N. Broadway Avenue, Suite 400 Oklahoma City, OK 73102-6006	regarding his training and experience in law enforcement and in re the LCSO's policies and procedures; will testify regarding his knowledge of and interactions with the Plaintiff.
3.	Rob Seale c/o Michael L. Carr COLLINS, ZORN & WAGNER, P.C. 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815	Is the former Sheriff for LeFlore County; will testify to refute the allegations in this case; will testify regarding his knowledge of the incident at issue in this case; will testify regarding his training and experience in law enforcement; will testify regarding his knowledge of and interactions with the Plaintiff; will testify regarding the LCSO's policies and procedures in effect at the time of the incident at issue.
4.	Jason Timms c/o Jim Gibbs Goolsby, Proctor, Heefner & Gibbs, P.C. 701 N. Broadway Avenue, Suite 400 Oklahoma City, OK 73102-6006	Is a former Deputy Sheriff; will testify regarding his knowledge of the incident at issue in this case; will testify regarding his training and experience in law enforcement and in re the LCSO's policies and procedures; will testify regarding his knowledge of and interactions with the Plaintiff.
5.	Sheriff Rodney Derryberry c/o Michael L. Carr COLLINS, ZORN & WAGNER, P.C. 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815	Is the current Sheriff of LeFlore County; will testify as to the current policies and procedures and customs and practices of the LeFlore County Sheriff's Office if necessary.
6.	Terry Winn 900 NW 3 <sup>rd</sup> Spiro, OK 74949	Is a former Deputy Sheriff; may testify regarding his knowledge of the incident at issue in this case; may testify regarding his training and experience in law enforcement and in re the LCSO's policies and procedures; may testify regarding his knowledge of and interactions with the Plaintiff.
7.	Andrew Bevel Address unknown	Is a former Deputy Sheriff; may testify regarding his knowledge of the incident at issue in this case; may testify regarding his training and experience in law

		enforcement and in re the LCSO's policies and procedures; may testify regarding his knowledge of and interactions with the Plaintiff.
8.	Cody Edwards 41679 Tiffe Rd. Howe, OK 74940 (918) 839-6522	Is a former Deputy Sheriff; may testify regarding his knowledge of the incident at issue in this case; may testify regarding his training and experience in law enforcement and in re the LCSO's policies and procedures; may testify regarding his knowledge of and interactions with the Plaintiff.
9.	Donnie Edwards 41627 Tiffe Road Howe, Oklahoma 74940 (918) 413-4201	Is a former Deputy Sheriff and the former Sheriff; may testify regarding his knowledge of the incident at issue in this case; may testify regarding his training and experience in law enforcement and in re the LCSO's policies and procedures; may testify regarding his knowledge of and interactions with the Plaintiff.
10.	Christopher Peterson c/o SMOLEN, SMOLEN & ROYTMAN, PLLC 701 Cincinnati Ave. Tulsa, OK 74119	Plaintiff; deposed.
11.	Tabitha West 705 Carter Street Poteau, OK	Will testify regarding the events of May 14, 2018.
12.	Plaintiff's medical care providers	
13.	Plaintiff's mental health care providers	

14.	All witnesses whose identities are determined during the course of discovery	
15.	All witnesses listed by all other parties, whether called or not	
16.	This list will be supplemented during discovery or as otherwise required by the Federal Rules of Civil Procedure or the Court's Scheduling Order	

Respectfully submitted,

s/ Michael L. Carr

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ATTORNEY FOR DEFENDANTS  
 BOARD OF COUNTY  
 COMMISSIONERS OF LEFLORE  
 COUNTY AND THE SHERIFF OF  
 LEFLORE COUNTY, IN HIS OFFICIAL  
 CAPACITY

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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***Attorney for Defendants Kendall Morgan  
and Tyler Ragan***

s/ Michael L. Carr

Michael L. Carr